

EXHIBIT C

EXHIBIT C**TOPICS IN PLAINTIFFS' 30(B)(6) NOTICE SERVED ON MARCH 19, 2024
SEEKING DISCOVERY-ON-DISCOVERY**

30(b)(6) Topic	Text of Topic
Topic No. 1	Your activities, practices, and policies related to your discovery obligations, and document preservation, retention, collection, searches, and productions of relevant and responsive Documents, in this case.
Topic No. 2	<p>All activities undertaken to meet Your document-related discovery obligations in this Action, including a summary of Google's ingestion sites and how they were searched, an identification of each person contacted in searching for responsive documents, an identification of all Google personnel that searched for documents responsive to the States' discovery requests, the Date(s) each search was performed, and the identity and location of all document repositories searched, including without limitation:</p> <ul style="list-style-type: none"> a. centralized and non-centralized servers or networks; b. shared drives; c. email servers; d. hard copy files; e. engineer, developer, researcher, consultant and employee desktop and/or laptop computers; f. databases containing electronically stored information relating to the Google Ad Tech Products and/or Ad Tech Auction Mechanics that the States' and/or Google identified and/or searched in responding to the States' discovery requests; and g. all steps that Google has taken to obtain consent from any Third-Party Publisher, Third-Party Advertiser, or Third-Party Exchange to produce in this Action such Documents or materials, including but not limited to Source Code, dashboards, and/or data.
Topic No. 3	Your information storage, organization, and retention practices and policies, including without limitation the management of technical documents and third-party documents and Your systems and policies for accounting, record keeping, and document retention for purposes of this Action.

30(b)(6) Topic	Text of Topic
Topic No. 4	<p>All steps Google has taken to preserve Documents, Source Code, dashboards, and data relating to this Action and/or the Google Ad Tech Products and Ad Tech Auction Mechanics, including but not limited to:</p> <ul style="list-style-type: none"> a. all steps taken in accordance with Google’s document retention policy as administered during the normal course of business; b. all steps taken that differ from Google’s document retention policy as administered during the ordinary course of business; and c. all Google personnel involved in the preservation of Documents relating to this Action and/or responsive to any discovery the States’ have served on Google in this Action. d. A discussion of the Documents that were not preserved by type, custodian and category.
Topic No. 5	The location, identity, and file and/or storage formats of all Documents, including but not limited to all electronically stored information and hard copy of documentation, relating to the Google Ad Tech Products and Ad Tech Auction Mechanics.
Topic No. 16	Your use of links in Documents, including but not limited to the use of go/ (or goto/) links, and the tools and database(s) you use to store, maintain, and search go/ links and to translate go/ links into underlying URLs.
Topic No. 17	The organization of the Source Code Computer, and the location on the Source Code Computer of all Source Code and data pertaining to each Google Ad Tech Auction Mechanic.
Topic No. 18	The preservation, retention, collection, searches, productions, policies, procedures, and practices related to Google chats (including but not limited to chats sent and received via instant messaging, Google Chat, Google Hangout, Slack, and Chat) that are relevant and responsive in this case, including the use of chats as related to Google’s Ad Tech business.
Topic No. 19	Google chats (including but not limited to chats sent and received via instant messaging, Google Chat, Google Hangout, Slack, and Chat) and use of chats as related to Google’s Ad Tech business and/or the topics in this notice, Google’s policies, procedures, and practices for chats, the different forms and types of chats, Google’s monitoring and retention of the same—both generally and as related to this litigation—its chat retention

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	<p>policies (including the current policy), any changes to that policy since 2013, the difference in “history on” and “history off” chats and the circumstances, procedures, practices, and policies related to each, including but not limited to:</p> <ul style="list-style-type: none"> a. whether, when, and in what circumstances Google suspended its 24-hour auto- delete policy for chat messages for chat messages related to this litigation and/or other ongoing or reasonably anticipated litigations and/or investigations including but not limited to sworn statements and testimony by Google representatives on these topics; b. the extent to which any document custodian in this case conducted chats with the default “history off” setting enabled, including: <ul style="list-style-type: none"> i. each employee subject to a litigation hold that may have conducted or did conduct “history off” chats regarding matters potentially relevant to this Investigation or Litigation, and the extent to which they did so; and ii. any direction or statements that Google provided to its employees about conducting chats with the “history off” or “off the record;” c. Google’s efforts, if any, to monitor or audit whether document custodians in this case turned their chat history “on” when discussing matters potentially relevant to this litigation; d. whether Google automatically deleted chat messages between employees including CEO Sundar Pichai; and e. the identity and overall numbers of Google employees who did not change their chat’s auto-delete setting even after they were made aware of their legal obligation to preserve evidence.